

WWR# 08081017

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS (CHICAGO)

In Re: Cecelia Johnson

Debtor,

Case No. 09-37011
Chapter 11
Hon. Jack B. Schmetterer

/

**MOTION TO EXTEND DEADLINE TO FILE OBJECTION TO DISCHARGE OF
DEBTS OR DISCHARGEABILITY OF A DEBT**

Comes now The Huntington National Bank ("HNB"), by and through its counsel, Monette Cope, of Weltman, Weinberg and Reis, and states as follows:

1. Debtor filed for relief under Chapter 11 on September 25, 2009.
2. The last date to object to dischargeability of a debt or the debtor's discharge is January 4, 2010.
3. It has just come to HNB's attention that Cecelia Johnson, Debtor in 09-37011 NDIL, sold all her shares in My Ranch, Inc. to Rasheeda Oghafua in 2008, making Oghafua the sole shareholder of My Ranch, Inc.
4. The transfer of shares is not listed in Ms. Johnson's statement of financial affairs.
5. Ms. Johnson signed two equipment leases as President of My Ranch, Inc. on November 7, 2008 and December 23, 2008.
6. HNB needs to investigate the circumstances surrounding the sale of Ms. Johnson's shares and her signing of two leases with HNB in late 2008.
7. HNB needs additional time to conduct an investigation and/or propound discovery to determine whether to file a complaint for non-dischargeability against Ms. Johnson and/or My Ranch, Inc.
8. Creditor requests an extension of the deadline to object to discharge and

dischargeability of the debt to continue settlement negotiations.

WHEREFORE The Huntington National Bank requests that the Bankruptcy Court enter an order extending the deadline to object to discharge or to determine the dischargeability of a debt until March 12, 2010 and for such other and further relief as this Court deems just.

Respectfully submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

Date: January 4, 2010

By: /s/ Monette Cope

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Attorney for Creditor
The Huntington National Bank

PROOF OF SERVICE

Creditor The Huntington National Bank filed a Motion to Extend Deadline to File Objection to Discharge of Debts or Dischargeability of a Debt. All parties were served a copy of the motion on January 4, 2010. The Motion was served upon Debtor(s) and unrepresented Creditors by depositing the same in the U.S. Mail at 180 N. LaSalle Chicago, Illinois postage prepaid addressed below. The remaining parties were served by the Court's CM/ECF electronic noticing.

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Forrest L. Ingram
Attorney for Debtor
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U.S. Trustee
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Chicago, IL 60604

Respectfully submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: /s/ Monette Cope
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